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IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAI'I

‘ĪLIO‘ULAOKALANI COALITION, a)	Civil No. 04-00502 DAE BMK
Hawai'i nonprofit corporation; NĀ ‘IMI)	
PONO, a Hawai'i unincorporated)	PLAINTIFF'S FIRST SET OF
association; and KĪPUKA, a Hawai'i)	INTERROGATORIES AND
unincorporated association,)	REQUESTS FOR PRODUCTION OF
)	DOCUMENTS AND THINGS
Plaintiffs,)	
)	
v.)	
)	
DONALD H. RUMSFELD, Secretary of)	
Defense; and FRANCIS J. HARVEY,)	
Secretary of the United States)	
Department of the Army,)	
)	
Defendants.)	
)	
)	
)	
)	
)	

PLAINTIFF'S FIRST SET OF INTERROGATORIES
AND REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS

EXHIBIT 3

TO DEFENDANTS AND THEIR COUNSEL:

Pursuant to Federal Rule of Civil Procedure (“FRCP”) 33 and the Court’s instructions at the status conference on November 20, 2006, plaintiffs ‘Īlio‘ulaokalani Coalition, Nā ‘Imi Pono, and Kīpuka (collectively, “the Hawaiian Groups”) hereby request that, no later than 10:00 a.m. on Monday, November 27, 2006, defendants answer separately and fully in writing and under oath the following interrogatories. Pursuant to FRCP 34 and the Court’s instructions, the Hawaiian Groups further request that, no later than the same time, defendants identify and produce for examination, inspection and copying all of the requested documents or things that are in their possession, custody or control at the offices of Earthjustice, 223 South King Street, Suite 400, Honolulu, Hawai‘i, or at some other convenient location acceptable to the Hawaiian Groups.

The interrogatories and document requests herein shall be deemed continuing, so as to require supplementation if you obtain or recall further information between the time the answers are served and the time this case is resolved. Answers may be inserted in the spaces provided. If additional space is required, please complete your responses on additional sheets bearing the same number of the interrogatory or document request that you are answering.

INTERROGATORY NO. 5: Please describe with particularity each Stryker-specific training exercise you contend the 2nd Brigade must conduct in Hawai'i to be mission deployable as an SBCT, including, but not limited to, a description, with respect to each exercise, of the number of days the exercise would last, the number of soldiers that would participate, the number and type of weapons that would be employed, the surface danger zones for the weapons that would be employed with respect to the range or other location where the weapons would be used, the number and type of munitions that would be expended, the number and type of Stryker vehicles that would participate, and the ranges or other locations where each exercise would take place.

RESPONSE TO INTERROGATORY NO. 5:

REQUEST FOR PRODUCTION NO. 5: Please identify and produce all documents that support, contradict, discuss or are in any way related to your response to Interrogatory No. 5, including, but not limited to, any schedules for Stryker-specific training and any maps of ranges or other locations where you propose to conduct Stryker-specific training.

INTERROGATORY NO. 6: Please state and explain fully all facts on which you base your contention that the training exercises described in response to Interrogatory No. 5 would not cause any harm to the human environment, including, but not limited to, harm to cultural sites, areas of traditional importance, endangered or threatened species, or native habitat.

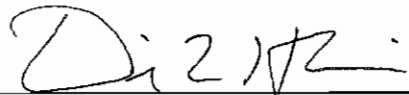
RESPONSE TO INTERROGATORY NO. 6:

REQUEST FOR PRODUCTION NO. 6: Please identify and produce all documents that support, contradict, discuss or are in any way related to your response to Interrogatory No. 6, including, but not limited to, any documents depicting or discussing the surface danger zone for proposed training at the ranges or other locations, any archaeological or biological surveys, any biological assessments or biological opinions prepared pursuant to the Endangered Species Act, any environmental documents prepared pursuant to the National Environmental Policy Act, and any analyses prepared pursuant to the PA.

REQUEST FOR PRODUCTION NO. 28: Please identify and produce any and all documents discussing or otherwise related to any and all identification, evaluation, or mitigation measures (including, but not limited to, any site protection plans) with respect to any cultural sites, areas of traditional importance or other cultural resources potentially affected by any of the training exercises described in response to Interrogatories Nos. 5, 7, or 10.

DATED: Honolulu, Hawai'i, November 20, 2006.

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By: 
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